PERMIT NON-COMPLIANCE SUMMARY

(Previously reported to District)

Facility ID: #B1326
Reporting period: February 1st, 2016 through July 31st, 2017.

Summary of DAS System Events

1. March 12th, 2017 – The reporting lost one hour of data during the daylight savings time change due to duplicate timer period. Reporting data is resident in the database.

Summary of CEMS System Events

None.

Summary of Other Events

1. On July 8th, 2017 the facility had a scheduled outage to perform some normal maintenance items. This outage lasted for 10.3 hours.

2. On July 26th, 2017 at midnight (24:00) the Facility's Power Purchase Agreement (PPA) with the Utility (PG&E) expired. The Facility sources were shut down due to this Contractual Issue. Anticipated start-up of the sources will be on August 1st, when the University PPA commences.

3. Commencing on July 27th, 2017, the University of California Berkeley will be purchasing all interests in the facility from PE-Berkeley, Inc. All permits, agreements, and legal responsibilities will be transferred to the University. **All future Regulatory Compliance and Reporting will become the responsibility of the University of California Berkeley.**

\ Attachment

Table VII–A
Applicable Limits and Compliance Monitoring Requirements
S–1, Emergency Diesel Engine Generator

Type of Limit	Emission Limit Citation	FE Y / N	Future Effective Date	Emission Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type	Compliance YES	Compliance / NO
Opacity	BAAQMD Regulation 6-1-303.1	N		>=Ringlemann 2.0 for no more than 3 minutes in any hour.		N		X	
Opacity	SIP Regulation 6-303.1	Y		>=Ringleman 2.0 for no more than 3 minutes in any hour		N		X	
FP	BAAQMD Regulation 6-1-310	N		0.15 gr/dscf		N		X	
FP	SIP Regulation 6-310	Y		0.15gr/dscf		N		X	
SO2	BAAQMD 9-1-301	Y		Property Line Ground level limits: <=0.5 ppm for 3 minutes and <= 0.25 ppm for 60 min. and <= 0.05ppm for 24 hours.	None	N	N/A	X	
	BAAQMD 9-1-304	Y		0.5%wt Sulfur in liquid fuel		P/E	Fuel certification of each delivery	X	
Hours of Operation	BAAQMD 9-8-330.1	N		Unlimited hours for emergencies.	BAAQMD 9-8-530.2	C P/M	Hour Meter, Records of Operating Hours	X	
	BAAQMD 9-8-330.2	N		100 hours per calendar year or permit limit whichever is lower for reliability-related activities	BAAQMD 9-8-530	C P/M	Hour Meter, Records of Operating Hours	X	
	BAAQMD 9-8-330.3	N	1/1/2012	50 hours per calendar year of permit limit whichever is lower for reliability-related activities	BAAQMD 9-8-530	C P/M	Hour Meter, Records of Operating Hours	X	
	BAAQMD Condition #22820 Part 2	Y		Unlimited Hours for Emergencies	BAAQMD Condition #22820 Part 3 and 4	C P/M	Hour Meter, Record Keeping	X	
	BAAQMD Condition #22820 Part 1	Y		<=20 hours per year for reliability-related activities	BAAQMD Condition #22820 Part 3 and 4	C P/M	Hour Meter, Record Keeping	X	

Table VII–B
Applicable Limits and Compliance Monitoring Requirements
S–40, Turbine

Type of Limit	Emission Limit Citation	FE Y / N	Future Effective Date	Emission Limit	Monitoring Frequency Citation	Monitoring Frequency (P/C/N)	Monitoring Type	Compliance YES	Compliance NO
NOX	BAAQMD 9-9-303.2	N		20.2 ppmv @ 15% O2, dry (adjusted per 9-9-401), except during start-up	BAAQMD 9-9-501	C	CEM	X	
NOX	SIP 9-9-303.2	Y		20.2 ppmv @ 15% O2, dry (adjusted per 9-9-401), except during start-up	SIP 9-9-501	C	CEM	X	
	BAAQMD 9-9-303.2	N		42 ppmv @ 15% O2, dry during natural gas curtailment or short testing periods	BAAQMD 9-9-501	C	CEM	X	
	SIP 9-9-303.2	Y		42 ppmv @ 15% O2, dry during natural gas curtailment or short testing periods	SIP 9-9-501	C	CEM	X	
	BAAQMD Cond #366 Part 4	Y		20.2 ppmdv – natural gas: @ 15% O2, 3 hr avg, except during startr-up	BAAQMD Cond #366 Part 12	C	CEM	X	
NOX	BAAQMD Cond #366 Part 5	Y		20.2 ppmdv – natural gas: @15% O2 (combined S-40 & S-41), 3 hr avg, except during start-up	BAAQMD Cond #366 Part 12	C	CEM	X	
	BAAQMD Cond #366 Part 6	Y		42 ppmdv – fuel oil: @15% O2, 3 hr avg, except during start-up	BAAQMD Cond #366 Part 12	C	CEM	X	
NOX	BAAQMD Cond #366 Part 7	Y		39 ppmdv – fuel oil: @15% O2 (combined S-40 & S-41), 3hr avg, except during start-up	BAAQMD Cond #366 Part 12	C	CEM	X	
	BAAQMD Cond #366 Part 10	Y		547 lb/day when burning natural gas and 1093 lb/day when burning fuel oil (combined S-40 & 41)	BAAQMD Cond #366 Part 12	C	CEM	X	
	NSPS Subpart GG, 60.332(a)(1)	Y		99 ppmdv @ 15% O2 dry, 4-hr average	NSPS Subpart GG, 60.334(b)	C	CEM	X	
CO	BAAQMD Cond #366 Part 4a	Y		200 ppm @ 15% O2 3-hour average except during start-up.	BAAQMD Cond #366 Part 12a	C	CEM	X	
CO	BAAQMD Cond #366 Part 5a	Y		200 ppm @ 15% O2 (combined S-40 & S-41) 3-hour average except during start-up	BAAQMD Cond #366 Part 12a	C	CEM	X	
CO	BAAQMD Cond #366 Part 10	Y		2195 lb/day (natural gas or fuel oil)(combined S-40 & 41)	BAAQMD cond #366 Parts 10, 12a, and 18	C	CEM, Annual source test	X	
SO2	BAAQMD Cond #366 Part 2	Y		Maximum of 0.12% by wt Sulfur in fuel oil	BAAQMD Cond #366 Parts 2	P/E	At each delivery, fuel sampling using District's laboratory procedure method 10	X	

[1] Ground level Concentration

Table VII–B
Applicable Limits and Compliance Monitoring Requirements
S–40, Turbine
Continued...

Type of Limit	Emission Limit Citation	FE Y / N	Future Effective Date	Emission Limit	Monitoring Frequency Citation	Monitoring Frequency (P/C/N)	Monitoring Type	Compliance YES	Compliance NO
SO2	BAAQMD Cond #366 Part 3	Y		Maximum of 0.25% by wt Sulfur in fuel oil during periods of natural gas curtailment	BAAQMD Cond #366 Parts 2	P/E	At each delivery, fuel sampling using District's laboratory procedure method 10	X	
	BAAQMD Cond #366 Part 11	Y		987 lb/day (natural gas) 40 tons/year (combined S-40 & S-41)	BAAQMD Cond #366 Parts 11	P/E	fuel sampling using District's laboratory procedure method 10	X	
SO2	BAAQMD 9-1-301	Y		GLC[1] of 0.5 ppm for 3 min or 0.25 ppm for 60 min or 0.05 ppm for 24 hours		N		X	
SO2	BAAQMD 9-1-302	Y		300 ppm (dry)		N		X	
	BAAQMD 9-1-304	Y		0.5% wt Sulfur in liquid fuel		P/E	Fuel certification	X	
SO2	NSPS Subpart GG, 60.333(a)	Y		0.015% (vol) @ 15% O2 (dry), or 0.8% sulfur in gaseous fuel by weight	NSPS Subpart GG, 60.334 (h)(3)	P/M or EN	Monthly gaseous fuel analysis of current, valid purchase contract, tariff sheet or transportation contract	X	
SO2	NSPS Subpart GG, 60.333(b)	Y		0.8% sulfur in fuel oil by weight	NSPS Subpart GG, 60.334(h)(1), 60.334(i)(1)	P/E	At each fuel oil delivery, fuel sampling using District's laboratory procedure method 10	X	
Opacity	BAAQMD 6-1-301	N		>=Ringlemann No. 1 for no more than 3 minutes in an hour	BAAQMD Cond #366 Part 19	P/E, during distillate oil combustion	Visible emissions monitoring	X	
Opacity	SIP 6-301	Y		>=Ringlemann No. 1 for no more than 3 minutes in an hour	BAAQMD Cond #366 Part 19	P/E, during distillate oil combustion	Visible emissions monitoring	X	
FP	BAAQMD 6-1-310	N		0.15 grain/dscf @ 6% O2		N		X	
FP	SIP 6-301	Y		0.15 grain/dscf @6% O2		N		X	

[1] Ground level Concentration

Table VII–C
Applicable Limits and Compliance Monitoring Requirements
S–41, Duct Burner

Type of Limit	Emission Limit Citation	FE Y / N	Future Effective Date	Emission Limit	Monitoring Frequency Citation	Monitoring Frequency (P/C/N)	Monitoring Type	Compliance YES	/ NO
NOX	BAAQMD 9-9-303.2	N		20.2 ppmv @ 15% O2, dry (adjusted per 9-9-401), except during start-up	BAAQMD 9-9-501	C	CEM	X	
NOX	SIP 9-9-303.2	Y		20.2 ppmv @ 15% O2, dry (adjusted per 9-9-401), except during start-up	BAAQMD 9-9-501	C	CEM	X	
	BAAQMD 9-9-303.2	N		42 ppmv @ 15% O2, dry during natural gas curtailment or short testing periods	BAAQMD 9-9-501	C	CEM	X	
	SIP 9-9-303.2	Y		42 ppmv @ 15% O2, dry during natural gas curtailment or short testing periods	BAAQMD 9-9-501	C	CEM	X	
NOX	BAAQMD Cond #366 Part 5	Y		20.2 ppmdv – natural gas: @15% O2 (combined S-40 & S-41), 3 hr avg, except during start-up	BAAQMD Cond #366 Part 12	C	CEM	X	
	BAAQMD Cond #366 Part 7	Y		39 ppmdv – fuel oil: @15% O2 (combined S-40 & S-41), 3hr avg, except during start-up	BAAQMD Cond #366 Part 12	C	CEM	X	
	BAAQMD Cond #366 Part 10	Y		547 lb/day when burning natural gas and 1093 lb/day when burning fuel oil (combined S-40 & S-41)	BAAQMD Cond #366 Parts 9 and 12	C	CEM	X	
	NSPS Subpart GG, 60.332(a)(1)	Y		99 ppmdv @ 15% O2 dry, 4 – hr average	NSPS Subpart GG, 60.334(b)	C	CEM	X	
CO	BAAQMD Cond #366 Part 5a	Y		200 ppm @ 15% O2 (combined S-40 & S-41) 3-hour average except during start-up	BAAQMD Cond #366 Part 12a	C	CEM	X	
	BAAQMD Cond #366 Part 10	Y		2195 lb/day (natural gas) 2195 lb/day (fuel oil) (combined S-40 & 41)	BAAQMD cond #366 Parts 10, 12a, and 18	C	CEM, Annual source test	X	
SO2	BAAQMD Cond #366 Part 11	Y		987 lb/day (natural gas) 40 tons/year (combined S-40 & 41)	BAAQMD Cond #366 Parts 11	P/E	At each fuel delivery, fuel sampling using District's laboratory procedure method 10	X	
SO2	BAAQMD 9-1-301	Y		GLC[1] of 0.5 ppm for 3 min or 0.25 ppm for 60 min or 0.05 ppm for 24 hours		N		X	
SO2	BAAQMD 9-1-302	Y		300 ppm (dry)		N		X	
	BAAQMD 9-1-304	Y		0.5% wt Sulfur in liquid fuel		P/E	Fuel certification	NA[2]	

[1] Ground level Concentration

[2] Not Applicable. Source #41 configured for gaseous fuel only.

Table VII–C
Applicable Limits and Compliance Monitoring Requirements
S–41, Duct Burner
Continued...

Type of Limit	Emission Limit Citation	FE Y / N	Future Effective Date	Emission Limit	Monitoring Frequency Citation	Monitoring Frequency (P/C/N)	Monitoring Type	Compliance YES	Compliance NO
SO2	NSPS Subpart GG, 60.333 (a)	Y		0.015% (vol) @ 15% O2 (dry), or 0.8% sulfur in gaseous fuel by weight	NSPS Subpart GG, 60.334(h)(3)	P/M or EN	Monthly gaseous fuel analysis of current, valid purchase contract, tariff sheet or transportation contract	X	
SO2	NSPS Subpart GG, 60.333 (b)	Y		0.8% sulfur in fuel oil by weight	NSPS Subpart GG, 60.334 (h)(1), 60.334(i)(1)	P/E	At each fuel delivery, fuel sampling using District's laboratory procedure method 10	NA[2]	
Opacity	BAAQMD 6-1-301	N		>=Ringlemann No. 1 for no more than 3 minutes in any hour	BAAQMD Cond #366 Part 19	P/E, during distillate oil combustion	Visible emissions monitoring	NA[2]	
Opacity	SIP 6-301	Y		>=Ringlemann No. 1 for no more than 3 minutes in any hour	BAAQMD Cond #366 Part 19	P/E, during distillate oil combustion	Visible emissions monitoring	NA[2]	
FP	BAAQMD 6-310	N		0.15 grain/dscf @ 6% O2			N	X	
FP	SIP 6-310	Y		0.15 grain/dscf @ 6% O2			N	X	

[1] Ground level Concentration
[2] Not Applicable. Source #41 configured for gaseous fuel only.